## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO

In Re: : Case Number: 23-60077

:

Derill C. Ferguson

Linda K. Ferguson, : Chapter 13

Debtor(s). : Judge JOHN GUSTAFSON

## MOTION TO SHORTEN TIME ON THE DEBTORS' MOTION TO PAY MORTGAGE DIRECT

Now comes, Derill and Linda Ferguson, (the "Debtors") and moves this court to shorten the notice period required under Section 9014 on the Motion to Pay Mortgage Direct for cause based on the following:

- 1. The Debtors filed a Chapter 7 Proceeding on January 25, 2023, which was converted to this Chapter 13 proceeding on April 13, 2023.
- 2. The Debtors have filed a Motion to Pay Mortgage Direct simultaneously with this Motion.
- 3. The confirmation hearing is scheduled for December 20, 2023, and an Order to Pay Mortgage Direct is needed for confirmation of the plan.

Wherefore, Debtors pray for an Order shortening the notice period from (14) days to (7) days in this case to allow an expedited entry of an Order to Pay Mortgage Direct.

Respectfully Submitted by:

/s/ David A. Mucklow
DAVID A. MUCKLOW (#0072875)
919 E. Turkeyfoot Lake Road, Suite B
Akron, OH 44312
Telephone: (330) 896-8190

Fax: (330) 896-8201

davidamucklow@yahoo.com

## **CERTIFICATE OF SERVICE**

I certify that on or about 13<sup>th</sup> day of December, 2023 that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list:

- Dynele L Schinker-Kuharich DLSK@Chapter13Canton.com, dschinkerkuharich@ecf.epiqsystems.com
- United States Trustee (Registered address)@usdoj.gov

I certify on or about 13<sup>th</sup> day of December, 2023 that a true and correct copy of the foregoing was sent via U.S. regular mail or certified mail to the persons listed below.

Derill C Ferguson Linda K. Ferguson 6750 Pontius Street NE Hartville, OH 44632

/s/ David A. Mucklow
DAVID A. MUCKLOW, (#0072875)
Attorney for the Debtors